

A-94-09

V-B-8

**Technical Support Document**  
**for**  
**Federal Implementation Plan (FIP)**  
**40 CFR 52.2958 Aerosol Coatings**



*Erik H. Beck*  
*United States Environmental Protection Agency, Region IX*  
*Air & Toxics Division (A-5-3)*  
*75 Hawthorne Street*  
*San Francisco, California 94105-3901*

*February 1, 1995*

## SUMMARY OF PROPOSAL

As described in the NPRM at 59 FR 23319, EPA proposed to restrict the VOC content of various categories of aerosol coatings. These restrictions would be effective January 1, 1996, and were proposed in order to reduce emissions of VOCs throughout the State of California. The proposed FIP aerosol paint rule was based on a draft regulation workshopped by CARB on November 10, 1993.

## CHANGES TO PROPOSAL

EPA has made substantial changes to the proposed measure in response to comments and to be consistent with CARB's evolving regulation. In the preamble of the NPRM, EPA stated its intention to mirror changes made to CARB's aerosol paint rule. The changes made to the proposed rule fulfill this intention. These changes are based on a version of CARB's rule workshopped in January, 1995. The significant changes made to the regulation are listed below. Additional materials from ARB are attached to further justify the measure. These materials include, the CalEPA/ARB documents, "Initial Statement of Reasons for a Proposed Statewide Regulation to Reduce Volatile Organic Compound Emissions From Aerosol Coating Products and Amendments to the Alternative Control Plan from Consumer Products," February 3, 1995 and "Appendices," February 3, 1995.

- 1) Postponed implementation to May 15, 1997;
- 2) Added VOC content limit for pigmented lacquers;
- 3) Revised the definitions of exact match finish, flat paint products, floral spray, glass coating, high temperature coating, non-flat paint product, and pleasure craft topcoat;
- 4) Added a definition of responsible party and modifying references to "manufacturer" to include references to "responsible party" where appropriate;
- 5) Modified the Table of Standards -- 1997 VOC content limits for marine spar varnish, slip resistant coating, and webbing/veil coating -- to match those in the draft CARB rule;
- 6) Modified the method of calculating the VOC content of multi-component kits;
- 7) Modified the test method procedure for metallic coatings;
- 8) Added a test method for acid content;
- 10) Permitted alternative test procedures following a source-specific FIP revision;
- 11) Added definitions for engine paint, precoat, retail outlet, and working day;
- 12) Clarified the definitions of enamel, exact match finish--automotive, metallic coating, rust converter, and vinyl/fabric/polycarbonate leather coating;
- 13) Modified the rule to allow more flexible use of methylene chloride;
- 14) Extended the use of pigmented lacquers;

15) Clarified the labeling and reporting requirements;

16) Clarified test methods.

#### EMISSION REDUCTIONS

The reduction estimates have not changed substantively from the FIP proposal. Revision #1 will delay reductions, but will not affect emission reductions in the attainment year. Revisions #5 and #13 will reduce emissions by an unknown amount. Revision #2 will increase emissions by an unknown amount. Qualitatively, EPA believes that taken together, all revisions will not increase emissions over those estimated in the proposal following implementation of the regulation. Reductions are also discussed in the attached CARB materials.

#### COSTS

Revision #1 will delay costs, and revisions #13, #14, and #15 should lead to a reduction of costs over those projected in the proposal. Costs are also discussed in the attached CARB materials.

#### RESPONSE TO COMMENTS

EPA received several significant comments from Sherwin Williams Corporation (SWC).

SWC opposed the technology forcing limits that were originally adopted by CARB and are being incorporated into the FIP consumer products regulation. SWC is also opposed to the absence of the CARB Alternative Compliance Plan in the FIP consumer products regulation.

*At the current time, EPA considers the technology forcing limits to be appropriate given the need to reduce VOC emissions throughout the FIP areas so that the NAAQS can be attained by the statutory deadlines. The technology forcing limits developed by CARB are technically sound at the present time. As the date of implementation of these technology forcing limits nears, EPA may revisit these limits and consider revising them, provided that the FIP measures have not been replaced by the state regulations adopted or planned for adoption by CARB.*

*EPA intends to replace the FIP rules concerning consumer products and aerosol paints with the rules adopted by CARB once those rules have been submitted to EPA as revisions to the State Implementation Plan, and have been determined to be in accordance with Federal law and EPA policy.*

SWC urges consistency between the emerging CARB aerosol coating regulations and the proposed FIP aerosol coating regulations. SWC also requests that EPA include a VOC content standard for aerosol lacquers in the final FIP regulations. Commenter suggests that the VOC content limit be set at 80% (presumably weight percent), with an effective date of January 1, 1996. SWC also requested clarification of the definitions for: floral spray and glass coating, hobby/model/craft coating, and responsible party.

*EPA is attempting to maintain as much consistency as possible with the evolving CARB aerosol coating regulations. Therefore, EPA has made some changes to the aerosol coating regulations in this notice. EPA has added a VOC content limit of 80% for pigmented lacquers to the final FIP regulation. EPA has also clarified definitions and made other minor changes to improve the rule's consistency with the draft CARB regulations.*

SWC suggested modifying several category headings, the paragraph regarding multicomponent kits, and making changes to the subsections regarding exemptions and reporting requirements.

*EPA is making these changes where necessary in order to increase compatibility with the January, 1995 draft CARB rule.*

## **Attachments**

"Initial Statement of Reasons for a Proposed Statewide Regulation to Reduce Volatile Organic Compound Emissions From Aerosol Coating Products and Amendments to the Alternative Control Plan from Consumer Products," CalEPA/ARB, February 3, 1995.

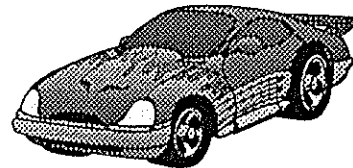
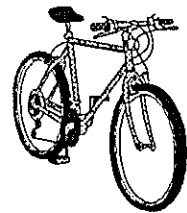
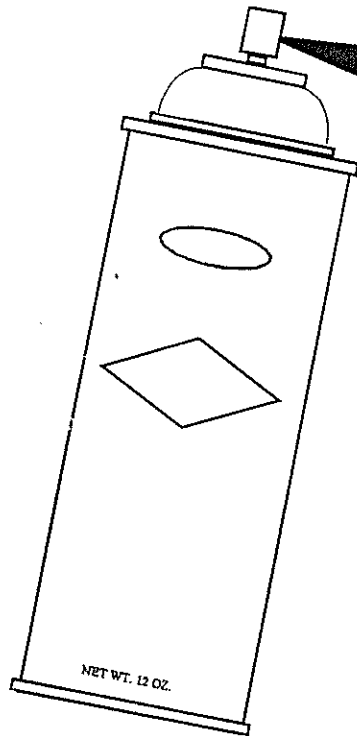
"Initial Statement of Reasons for a Proposed Statewide Regulation to Reduce Volatile Organic Compound Emissions From Aerosol Coating Products and Amendments to the Alternative Control Plan from Consumer Products -- APPENDICES," CalEPA/ARB, February 3, 1995.

California Environmental Protection Agency



# Air Resources Board

**Initial Statement of Reasons for a Proposed  
Statewide Regulation to Reduce Volatile  
Organic Compound Emissions from  
Aerosol Coating Products and Amendments  
to the Alternative Control Plan for Consumer Products**



**Release Date:  
February 3, 1995**



California Environmental Protection Agency



**Air Resources Board**

**Initial Statement of Reasons for a Proposed  
Statewide Regulation to Reduce Volatile  
Organic Compound Emissions from  
Aerosol Coating Products and Amendments  
to the Alternative Control Plan for Consumer Products**

# **APPENDICES**

**Release Date:  
February 3, 1995**

